NEW MEXICO ASSOCIATION OF CONSERVATION DISTRICTS

163 Trail Canyon Road   (575) 361-1413
Carlsbad, NM 88220   conserve@nmacd.org

November 30, 2021

EMNRD Forestry Division C/O Ms. Wendy Mason
wendy.mason@state.nm.us
1220 S St. Francis Dr.
Santa Fe, NM 87505

Dear Ms. Mason:

The New Mexico Association of Conservation Districts (NMACD) has reviewed the New Mexico Forestry Division's (Division) proposed rule pertaining to the prescribed burn manager certification program. NMACD appreciates the opportunity to provide this official feedback for this new rule. As you are aware, NMACD participated in the work group that developed the draft rule and we are pleased to notice that many of our suggestions and recommendations, which were discussed during the work group meetings, have been incorporated in the latest version. So, we don't have additional recommendations at this time.

NMACD, having participated in the work group that helped to develop the two pieces of legislation that led up to this rule, is very concerned about providing landowners the tools and support to conduct more prescribed burning projects on private land in New Mexico. The lower liability standards, as well as the training and certification program that will be available to burners will help facilitate some of these private land prescribed burn projects. We do, however, believe that in order for this prescribed burning initiative to be as successful as possible, a program to provide access to prescribed burning equipment to landowners and burners should be developed. As we discussed during the development of the prescribed burning legislation and this rule, the Division, NMACD and individual soil and water conservation districts could partner in the development of this type of program. We appreciate Division staff working with us in putting together the initial elements of this program.

Once again, NMACD appreciates being included in the Forestry Division's work groups that focused on this important initiative.
Sincerely:

Debbie Hughes, Executive Director NMACD